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# WISCONSIN LEGISLATIVE COUNCIL

## RULES CLEARINGHOUSE

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### CLEARINGHOUSE RULE 01-153

#### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]**

#### **2. Form, Style and Placement in Administrative Code**

a. The relating clause does not sufficiently alert the reader to the subject matter of the rule. Adding “for independent social workers and independent clinical social workers” at the end of the clause would be helpful.

b. The rule contains no initial applicability clause. Is it intended to apply to everyone immediately after it becomes effective or, for example, only to persons who receive the required degree and certification on or after the effective date of the rule? In other words, consideration should be given to the effect of the rule on persons presently engaged in supervised practice in reliance on the current rules.

#### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. The department’s analysis only describes SECTION 2 of the rule; there is no description of SECTION 1. Further, the department’s analysis makes reference to supervised “clinical” social work practice. It is assumed that the reference to “clinical” is inappropriate because the supervised practice must meet the criteria under s. SFC 4.01.

b. To ensure that the rule requires the entire two years of supervised social work practice to occur after the degree and certification requirements are met, it is suggested that “commenced and” precede “completed” in both rule provisions.